

EPA Comments on the Final "No Further Action Justification"
Document for OU 16, Low Priority Sites

General Comments

Overall, this document is considerably improved from the draft version. This document now includes a rationale to support the recommendation for no further action or additional action required at each OU 16 individual hazardous substance site (IHSS). The type of information provided to support the recommendation included records of incidents, response actions, analytical data, qualitative discussion on the fate and transport of contaminants and a discussion on risk assessment conceptual model. EPA agrees that no further action is needed for IHSSs 185, 192, 193, and 194. However, EPA believes that IHSS 195, 196 and 197 will need further investigation.

Nickel Oxide residues in IHSS 195 resulting from the reaction of Nickel (produced by combustion of Nickel carbonyl) with oxygen may still be present in the bottom of the dry well or on the surface around the well. While it may be true that Nickel Oxide is not currently present at high concentrations, this document does not include information on the toxicity of Nickel Oxide and concentration levels that may pose a threat to human health. Toxicity for Nickel Oxide must be included in this document to allow evaluation of the need for further action at this IHSS. In the case Nickel Oxide is highly toxic, EPA will recommend that further investigations be conducted for IHSS 195.

EPA agrees with DOE's recommendation for further action at IHSS 196. Since, IHSS 196 is located in the area of OU 5, EPA recommends DOE amending the Phase I RFI/RI workplan for OU 5.

It is unknown whether all the contamination in IHSS 197 was removed during the 1981 excavation activities. There exists the potential that contaminated areas were missed during the excavation. If this is the case, a source currently exists and the exposure pathways are complete. Therefore, EPA recommends that further action be conducted for this IHSS.